

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re Petition of)	
)	
Comcast Cable Communications, LLC,)	CSR-
on behalf of its subsidiaries and affiliates)	
)	
For Modification of the Television Market of)	
Station WYCI, Channel 40, Saranac Lake, New York)	

TO: Office of the Secretary
Attn: Chief, Media Bureau

PETITION FOR SPECIAL RELIEF

Comcast Cable Communications, LLC, on behalf of its subsidiaries and affiliates (hereinafter "Petitioner" or "Comcast"), pursuant to Section 614(h)(1)(C) of the Communications Act and Sections 76.7 and 76.59 of the Commission's rules, hereby requests that the television market of WYCI (Channel 40, Saranac Lake, New York) ("WYCI" or "Station") be modified to exclude certain communities served by Petitioner that are located in the Burlington-Plattsburgh DMA (the "Cable Communities").¹ Although WYCI's city of license, Saranac Lake, New York, falls within Burlington-Plattsburgh DMA, Petitioner's systems serving the Cable Communities are located in New Hampshire and Vermont, well beyond the Station's service coverage.²

¹ A list of the Cable Communities and the corresponding CUID numbers is attached hereto as Exhibit 1. The location of the Cable Communities and WYCI's city of license, Saranac Lake, New York is shown on the maps obtained from the *Rand McNally Road Atlas (2016 Edition)* and attached hereto as Exhibit 2. The location of the Cable Communities and Saranac Lake is also shown on the Longley-Rice map included as Exhibit 3 hereto.

² By letter dated May 10, 2016, WYCI requested mandatory carriage on Comcast's systems serving communities in the Burlington-Plattsburgh DMA. *See* Exhibit 4. In response, Comcast tested the Station's signal and found that WYCI fails to deliver a "good quality" signal to any of the principal headends serving the Cable Communities. Comcast notified the Station of WYCI's signal strength deficiencies and Comcast's belief that a market modification is warranted with respect to the Cable Communities. *See* Exhibit 5 (including signal strength measurements).

Affording WYCI “must carry” status in the Cable Communities would be at odds with the goals underlying Section 614 of the 1992 Cable Act, and the Commission’s rules adopted pursuant thereto. Accordingly, the Commission should “exclude [the] communities from such station’s television market to better effectuate the purposes of this section.”³

In considering such requests, the Communications Act requires that the Commission review the following factors:

- (I) whether the station, or other stations located in the same area, have been historically carried on the cable system or systems within such community or on the satellite carrier or carriers serving such community;
- (II) whether the television station provides coverage or other local service to such community;
- (III) whether modifying the market of the television station would promote consumers’ access to television broadcast station signals that originate in their State of residence;⁴
- (IV) whether any other television station that is eligible to be carried by a cable system in such community in fulfillment of the requirements of this section provides news coverage of issues of concern to such community or provides carriage or coverage of sporting and other events of interest to the community; and
- (V) evidence of viewing patterns in households that subscribe and do not subscribe to the services offered by multichannel video programming distributors within the areas served by such multichannel video programming distributors in such community.⁵

A review of all the applicable factors and the evidence detailed below and included in the attached exhibits demonstrates that WYCI should not be afforded “must carry” status in the Cable Communities. The Commission has observed that “the broadcast signal carriage rules

³ 47 U.S.C. § 534(h)(1)(C).

⁴ The STELA Reauthorization Act of 2014, Pub. L. No. 113-200, 128 Stat. 2059 (2014) (“STELAR”), added this new statutory factor, denominated as factor III. *See also Amendment to the Commission’s Rules Concerning Market Modification, Implementation of Section 102 of the STELA Reauthorization Act of 2014*, 30 FCC Rcd. 10406 (2015) (“Market Modification Order”).

⁵ *See* 47 U.S.C. § 534(h)(1)(C).

were not intended to transform an otherwise local station into a regional ‘super station’ that must be automatically carried in every single community in an ADI.”⁶ Affording must carry status to WYCI, which has no true local nexus with the Cable Communities, would disserve Petitioner’s subscribers by limiting Petitioner’s flexibility to provide the programming and services that its customers prefer. Such a result clearly would be contrary to the purpose of the must carry statute and rules.

I. WYCI Has Not “Been Historically Carried” in the Cable Communities.

WYCI has not been historically carried on the cable system lineups that serve the Cable Communities, despite the more than 10 years it has been licensed to operate.⁷ Congress expressly instructed the Commission to consider “historic carriage” in market modification cases to “better effectuate the purposes” of the broadcast signal carriage scheme,⁸ and the Commission has repeatedly relied on a lack of historic carriage in removing particular cable communities from a broadcast station’s default market assignment.⁹ Consideration of the historic carriage factor enables the Commission to simultaneously ensure that: (i) market assignments more “accurately reflect the area in which a particular station should be entitled to cable carriage;” and

⁶ *Time Warner Entertainment-Advance/Newhouse Partnership*, 11 FCC Rcd. 6541, ¶ 25 (1996).

⁷ Channel lineups for the Cable Communities are attached hereto as Exhibit 7. According to the FCC’s website, WYCI was initially licensed under the call sign WCWF in 2006. *See* Exhibit 8. In addition to the historic lack of cable carriage, it does not appear that DBS service providers Dish and DirecTV carry WYCI in the counties where the Cable Communities are located. Broadcast channel programming lineups for Burlington, Vermont from DirecTV and Dish are attached hereto as Exhibit 9.

⁸ *See* 47 U.S.C. § 534(h)(1)(C); H.R. REP. NO. 102-628, at 97 (1992); *CSC TKR, Inc.*, 16 FCC Rcd. 12577, ¶ 14 (2001).

⁹ *See, e.g., Time Warner Entertainment – Advance/Newhouse Partnership d/b/a Time Warner Cable*, 16 FCC Rcd. 15286 ¶ 9 (2001); *Comcast Cablevision of the District, LLC*, 18 FCC Rcd 16510, ¶¶ 9, 14 (2003); *Massillon Cable TV, Inc.*, 26 FCC Rcd 15221, ¶¶ 15, 16 (2001).

(ii) "disruption to subscribers over the broadcast signals they receive is minimized."¹⁰ Because WYCI is not carried on the systems serving the Cable Communities, the exclusion of the communities from the Station's television market would neither disrupt established viewing patterns nor deprive the Station of any existing cable audience. In this case, WYCI's lack of historic carriage confirms that there is no nexus between WYCI and the Cable Communities.

II. WYCI Does Not "Provide[] Coverage or Other Local Service" to the Cable Communities.

The Commission has stated that for purposes of a market modification petition, an analog station's local coverage area "may be demonstrated by the presence of a predicted Grade B contour, or by proximity to the community or communities in question."¹¹ In the Market Modification Order, the Commission revised its rules to add a reference to the noise-limited contour as the relevant service contour for a full-power station's digital signal.¹² As shown in Exhibit 3, the Longley-Rice digital signal coverage map demonstrates that all of the Cable Communities are located well beyond WYCI's 41 dBu service area contour reach.¹³ Indeed, WYCI's signal contour falls short of the "closest" of the Cable Communities (e.g., Burlington,

¹⁰ *Implementation of Cable Television Consumer Protection and Competition Act of 1992, Broadcast Signal Carriage Issues*, 8 FCC Rcd. 2965, ¶ 42 (1993).

¹¹ *Montgomery Cablevision, L.P. d/b/a Cable TV Montgomery*, 10 FCC Rcd. 2732, ¶ 19 (1995) (citing MM Docket 92-259, 8 FCC Rcd. 2965, ¶ 42 (1993)). See also 47 C.F.R. § 76.59(b)(2).

¹² See Market Modification Order ¶ 21. See also 47 C.F.R. § 76.59(b)(2).

¹³ See Exhibit 3. Signal strength measurements are included in Exhibit 5. The noise-limited service contour for WYCI (Channel 40) is 41 dBu. See 47 C.F.R. § 73.622(e)(1). The Commission has held: "[T]he Longley-Rice model provides a more accurate representation of a station's technical coverage area because it takes into account such factors as mountains and valleys that are not specifically reflected in a traditional . . . contour analysis." *Definition of Markets for Purposes of the Cable Television Broadcast Signal Coverage Rules*, 14 FCC Rcd. 8366, ¶ 50 (1999).

Vermont) by approximately 20 miles.¹⁴ Moreover, the attached signal strength studies taken at Petitioner's principal headends demonstrate that WYCI does not provide an off-air signal of adequate strength to the *system headends*, let alone to individual *households* in those Cable Communities.¹⁵ Simply put, WYCI does not "provide[] coverage" to the Cable Communities.¹⁶

The lack of signal coverage could be reasonably anticipated, as WYCI's city of license, Lake Saranac, New York, is essentially surrounded by the Adirondack Mountains in the westernmost counties of the DMA (Essex, and Franklin, New York), and the average distance between the Station and the Cable Communities (all located in New Hampshire and Vermont), is more than 80 miles.¹⁷ In fact, distances from Saranac Lake to the Cable Communities range from 43 miles (Charlotte, Vermont) to as far as 121 miles (Sunapee, New Hampshire).¹⁸ These distances are similar to or exceed those found to justify market modification requests in numerous orders issued by the Commission.¹⁹

The lack of nexus between WYCI and the Cable Communities is also demonstrated by the fact that there is no Interstate highway directly connecting Saranac Lake, New York to the

¹⁴ See Exhibit 3. The most distant of the Cable Communities (Sunapee, New Hampshire) lies approximately 90 miles beyond WYCI's signal contour. *Id.*

¹⁵ See Exhibit 5. These findings are buttressed by the signal coverage map available from the FCC's website and attached hereto as Exhibit 10, which further illustrates that WYCI's signal fails to reach the Cable Communities.

¹⁶ 47 U.S.C. § 534(h)(1)(C)(ii)(II).

¹⁷ The distances from Saranac Lake, New York to each of the respective Cable Communities were obtained from <http://www.indo.com/distance> and are attached hereto as Exhibit 6.

¹⁸ *Id.*

¹⁹ See, e.g., *Comcast Cable Communications, LLC*, 30 FCC Rcd. 2048, ¶ 8 (2015) (56 to 97 miles); *Greater Worcester Cablevision, Inc.*, 13 FCC Rcd. 22220, ¶ 8 (1998) (39 to 70 miles); *Greater Worcester Cablevision, Inc.*, 12 FCC Rcd. 17347, ¶ 21 (1997) (38 to 61 miles); *Time Warner Cable*, 12 FCC Rcd. 23249, ¶ 15 (1997) (42 to 58 miles); *Time Warner Cable*, 11 FCC Rcd. 13149, ¶ 13 (1996) (45 miles); and *Cablevision of Cleveland, L.P. and V Cable, Inc. d/b/a Cablevision of Ohio*, 11 FCC Rcd. 18034, ¶ 13 (1996) (41 miles).

Cable Communities in New Hampshire and Vermont.²⁰ Indeed, the driving distances and times between Saranac Lake and the Cable Communities are substantial. For example, it is approximately 174 miles driving distance from Saranac Lake to the Cable Community of Brighton, Vermont, which is approximately 3 hours and 46 minutes driving time.²¹ The Cable Communities are an average of approximately 118 miles driving distance and 2 hours and 41 minutes driving time from Saranac Lake.²² The significant driving distances and times reflect the fact that there are significant geographical barriers separating Saranac Lake from the Cable Communities, such as the Adirondack High Peaks, Lake Champlain, and the Green Mountains.²³ These geographical barriers, which are typical of the mountainous terrain in upstate New York, New Hampshire and Vermont, are also reflected in the Longley-Rice map attached as Exhibit 3, and serve to highlight the lack of nexus between WYCI and the Cable Communities.²⁴ As the Commission's rules acknowledge, all of this evidence is relevant to establishing the "scope of the market" served by WYCI.²⁵

²⁰ See Exhibits 2 and 11.

²¹ Driving distances and estimated driving times between the locations were obtained from <http://www.maps.google.com>. See Exhibit 11. WYCI's situation is consistent with the "hub and spoke" model described by the U.S. Court of Appeals for the Second Circuit, in which the court upheld the exclusion of certain New York DMA communities from various stations' must carry markets. See *WLNY-TV, Inc. v. FCC*, 163 F.3d 137 (2d Cir. 1998). Here, WYCI is located in the western reaches of the Burlington-Plattsburgh market and can, at most, be described as a "spoke" with regard to the "hub" of Burlington. While some Saranac Lake, New York residents may look to the Burlington television market for programming, residents in the Cable Communities do *not* look to Saranac Lake.

²² *Id.*

²³ See Exhibits 2 and 11.

²⁴ The Longley-Rice map demonstrates that WYCI does not even provide signal coverage to the whole of either of its home counties (Essex, and Franklin Counties, New York), let alone the Cable Communities, which are all located well east of Saranac Lake in New Hampshire and Vermont. See Exhibit 3.

²⁵ 47 C.F.R. § 76.59(b)(1).

Additionally, recent U.S. Census workforce data show that a *de minimis* number of residents, *if any*, from the Cable Communities work in WYCI's city of license, Saranac Lake, New York -- further weakening any possible nexus between WYCI and the Cable Communities.²⁶ Indeed, U.S. Census data pertaining to Saranac Lake does not report any discernable workforce from the New Hampshire or Vermont counties in which the Cable Communities are located.²⁷

Finally, Petitioner was unable to find any "local programming" listings identifying WYCI or its programming.²⁸ Recent broadcast schedules provided by WYCI, however, indicate that the Station is showing programming from the American Sports Network ("ASN").²⁹ As the ASN website makes clear, ASN features sports programming from across the country, and it is not targeted for service to the particular Cable Communities.³⁰ The Station's schedules do reference a limited amount of non-network programming, but WYCI has not offered any details of how this programming targets the Cable Communities. The non-network programming appears to be identical to the programming offered by LPTV stations WYCU-LD (Charlestown, NH) and WYCX-CD (Manchester, VT), which Petitioner already carries on its system serving many of the same communities.³¹ WYCI's programming does not appear to address the majority of the

²⁶ U.S. Census workforce data was obtained from <http://onthemap.ces.census.gov>, relevant portions of which are attached hereto as Exhibit 12.

²⁷ *See id.*

²⁸ For example, Petitioner was unable to locate evidence of WYCI's programming in the *Burlington Free Press*, *Rutland Herald*, or *Union Leader* program listings, which are generally available to the residents of the Cable Communities. *See* Exhibit 13.

²⁹ *See* Exhibit 14. *See also* ASN website at <http://americansportsnet.com/>.

³⁰ *See* American Sports Network, *About*, <http://americansportsnet.com/about/> (American Sports Network, *Conferences*, <http://americansportsnet.com/conferences/>).

³¹ As shown in Exhibit 7, Petitioner's "Claremont" channel lineup includes WYCU-LD and WYCX-CD, both of which are licensed to the same licensee as WYCI -- Crosshill Communications, LLC.

other Cable Communities, such as those located in and around the core-market community of Burlington.³² In any event, the Station's limited non-network programming cannot outweigh WYCI's failure to provide off-air coverage to the Cable Communities, the significant distance and geographical barriers separating WYCI from the Cable Communities, and all of the other statutory factors weighing in favor of the requested market modification.

III. Mandating Carriage of WYCI Would Not Promote Access to In-State Stations.

The third statutory market modification factor, recently added by the STELA Reauthorization Act of 2014,³³ considers whether modifying the market of a television station would promote consumer access to in-state broadcast stations.³⁴ If anything, carriage of WYCI would be contrary to the Commission's objective of ensuring in-state carriage by MVPDs, as WYCI is licensed to a community in New York, and the Cable Communities are located in New Hampshire and Vermont. Moreover, the Commission has explained that this new third statutory factor "is intended to favor a market modification to *add* a community" to a station's local market.³⁵ The Commission concluded:

[T]he new in-state factor is not intended to bar a market modification simply because it would not result in increased consumer access to an in-state station's programming. In such cases, we find that this new in-state factor would be inapplicable and the modification request would be evaluated based on the other statutory factors.³⁶

³² Interestingly, WYCI's broadcast schedule is devoid of any programming that focuses on its own city of license, Saranac Lake. See Exhibit 14.

³³ See STELAR, Pub. L. No. 113-200, 128 Stat. 2059.

³⁴ See 47 U.S.C. § 534(h)(1)(C)(ii)(III).

³⁵ *Amendment to the Commission's Rules Concerning Market Modifications: Implementation of Section 102 of the STELA Reauthorization Act of 2014*, "Notice of Proposed Rulemaking," 30 FCC Rcd. 3039, ¶ 11 (2015) ("Market Modification NPRM").

³⁶ Market Modification Order at ¶19.

Because Petitioner is seeking to *remove* the Cable Communities from WYCI's designated television market, rather than add a new community, this factor is inapplicable. In any event, there are already in-state stations (providing in-state coverage) available in the Cable Communities.³⁷

IV. Other Television Stations Carried by the Cable Systems Serving the Cable Communities Provide News Coverage of Issues of Concern and Coverage of Sporting and Other Events of Interest to the Cable Communities.

The systems serving the Cable Communities currently carry a number of truly local broadcast stations (many in multiple formats and multiple streams), which provide coverage of local news and sporting events and that deliver digital contour coverage or an actual off-air signal to the Cable Communities.³⁸ For example, the systems at issue carry stations WCAX-TV (CBS) and WVNY-TV (ABC), licensed to Burlington, Vermont, and WPTZ-TV (NBC), licensed to Plattsburgh, New York, each of which provide more than 22 hours of local newscasts Monday through Friday.³⁹

Even if WYCI were to provide significant or unique programming specifically targeting the Cable Communities, which it does not, the coverage provided by other, truly *local* stations would undermine any special benefits associated with WYCI.

V. WYCI Has No Reported Viewership in the Cable Communities.

The fifth statutory factor requires that the Commission consider audience viewing patterns in both MVPD and non-MVPD households. The Station has no reported viewership in these communities. This is not surprising because WYCI is unable to deliver an off-air signal or provide a 41 dBu service contour to the Cable Communities. Indeed, the Nielsen NSI local

³⁷ See Exhibits 7 and 13.

³⁸ See Exhibit 7. See also Exhibit 15.

³⁹ The relevant programming schedules were obtained from www.tvguide.com/listings and are attached hereto as Exhibit 16.

Market Viewers in Profile (VIP) book, for the recent period (May, 2016), attached hereto as Exhibit 17, indicates that, although WYCI is assigned to the Burlington-Plattsburg market, it does not meet the "minimum reporting standards." Thus, this factor also weighs in Petitioner's favor.

CONCLUSION

Based on all of the applicable criteria established by Congress and the Commission for determining whether a market modification is justified, WYCI's must carry market should be modified to make it congruous with market realities. Accordingly, for the reasons stated herein, Petitioner hereby requests that the Commission modify WYCI's "must carry" market to exclude the Cable Communities.

Respectfully submitted,
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on behalf of its subsidiaries and affiliates

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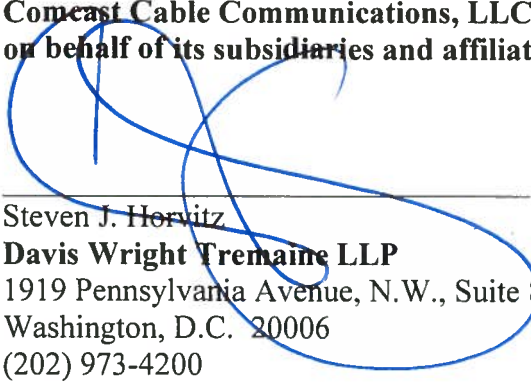
CERTIFICATION PURSUANT TO 47 C.F.R. § 76.6(a)(4)

The below-signed signatory has read the foregoing Petition for Special Relief, and to the best of my knowledge, information and belief formed after reasonable inquiry, it is well grounded in fact and is warranted by existing law or a good faith argument for the extension, modification or reversal of existing law; and is not interposed for any improper purpose.

Respectfully submitted,

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on behalf of its subsidiaries and affiliates

By:



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EXHIBITS 1 – 17 are provided on CD

A hard copy of the Exhibits are available upon request.

CERTIFICATE OF SERVICE

I, Deborah D. Williams, do hereby certify on this 4th day of August, 2016 that a true and correct copy of the foregoing "Petition for Special Relief" has been sent via U.S. mail, postage prepaid to the following:

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(14) STREET ADDRESS LINE NO. 1 1919 Pennsylvania Ave. N.W.		
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(16) CITY Washington	(17) STATE DC	(18) ZIP CODE 20006-3402
(19) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) 202-9734200		(20) COUNTRY CODE (IF NOT IN U.S.A.) US
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(21) APPLICANT (FRN) 0004063681		(22) FCC USE ONLY
COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET		
(23A) FCC Call Sign/Other ID WYCI	(24A) Payment Type Code(PTC) TQC	(25A) Quantity 1
(26A) Fee Due for (PTC) \$1,465.00	(27A) Total Fee \$1465.00	FCC Use Only
(28A) FCC CODE 1 0	(29A) FCC CODE 2 0	
(23B) FCC Call Sign/Other ID	(24B) Payment Type Code(PTC)	(25B) Quantity
(26B) Fee Due for (PTC)	(27B) Total Fee	FCC Use Only
(28B) FCC CODE 1	(29B) FCC CODE 2	